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January 19, 2018

VIA ELECTRONIC FILING

Ms. Marlene Dortch Secretary Federal Communications Commission 445 12th Street SW Washington DC 20554

Re: Improving Wireless Emergency Alerts and Community-Initiated Alerting, PS Docket No. 15-91.; Amendment to Part 11 of the Commission's Rules Regarding the Emergency Alert System, PS Docket 15-94

Dear Ms. Dortch:

On January 17, 2018, AT&T, along with CTIA and its other member companies, met with representatives from Chairman Ajit Pai and the Public Safety and Homeland Security Bureau listed in Attachment 1 concerning the Commission's Further Notice of Proposed Rulemaking in the above-referenced proceeding. During the meeting, we discussed a letter filed by AT&T on January 16, 2018¹.

In this January 16th letter, AT&T attached a graph to show the potential impact of including compressed vertex information to enable device-based geotargeting on Wireless Emergency Alert Message Length. In that letter, it inaccurately stated that 0.1 miles for device-based geotargeting could be met with two digits of precision – this should have stated that it required three digits of precision. However, the graph in the original letter (reincluded here as Attachment 2 for completeness) correctly used the three digits of precision for the calculation. And it showed that, in order to preserve 360 characters of displayable text for the alert originator, the geotargeting information for an alert must be limited to 87 vertices or less.

In addition, the Bureau Staff asked what the impact of including polygons that include 4 digits of precision past the decimal point would be on the number of characters available for alert originators for an alert. The graph included in Attachment 3 shows that, in order to

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¹ See AT&T Letter at https://ecfsapi.fcc.gov/file/1011600981944/WEA%20Letter%201-16-2018.pdf.

preserve 360 characters of displayable text for an alert originator, the geotargeting information for an alert must be limited to 76 vertices or less.

Sincerely,

/s/ Joseph P. Marx Assistant Vice President, AT&T Services Inc.

Cc: Marcus Brown Megan Henry Linda Nagle Rasoul Safavian Emily Talaga James Wiley

Attachment(s)

Attachment 1

AT&T Joseph Marx

CTIA

Scott Bergmann Matthew Gerst Tom Dombrowsky (DLA Piper)

CTIA Member Companies

John Kuzin (Qualcomm) Rob Kubik (Samsung) Ray Rothermel (Sprint) Shellie Blakeney (T-Mobile) Grant Spellmeyer (US Cellular) Robert Morse (Verizon)

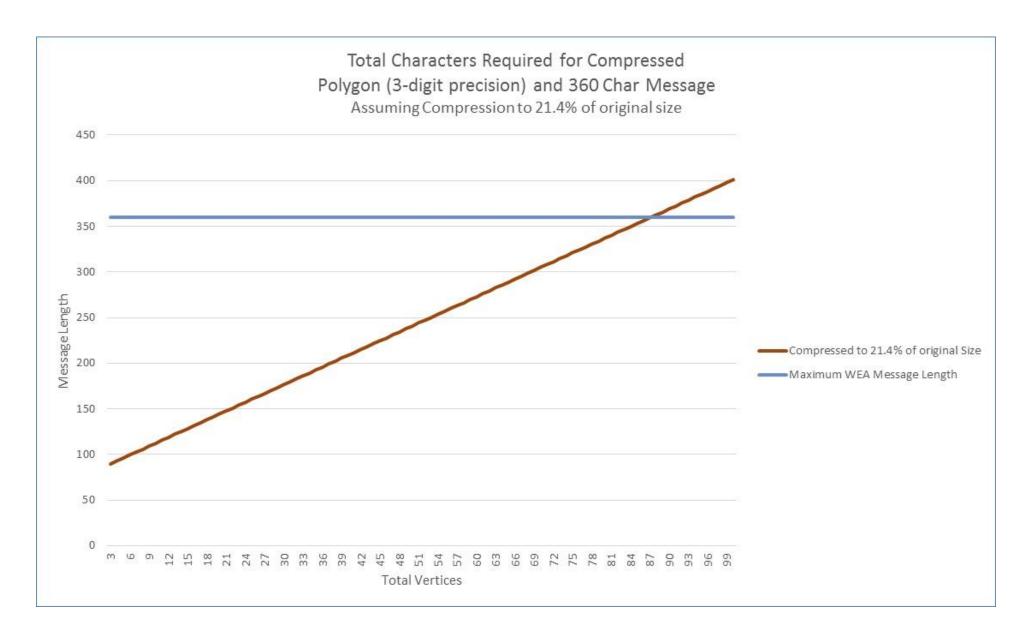
Chairman's Office

Zenji Nakazawa

Public Safety & Homeland Security Bureau

Nicole McGinnis Megan Henry Rasoul Safavian

Attachment 2



Attachment 3

